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BY HAND DELIVERY & CM/ECF

The Honorable Leonard P. Stark
United States District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,
D. Del. C.A. No. 1:17-mc-00151-LPS

Dear Judge Stark:

In the Memorandum Order Regarding Sale Process and Litigation dated December 31, 2024 (D.I. 1517), the Court ordered that “[a]ny party may obtain limited discovery that is relevant to whether the Court should approve the bid the Special Master recommends to the Court as his Final Recommendation and is proportional to the needs of the case.” D.I. 1517, ¶ 29. In addition, the Court’s Memorandum Order Regarding Open Matters dated January 27, 2025, instructed the Special Master and his advisors “use reasonable efforts to produce materials requested by the Venezuela Parties.” D.I. 1554 at 3.

CITGO Petroleum Corporation (“CITGO”) and PDV Holding, Inc. (“PDVH”) have served discovery requests on the Special Master, and the Special Master has been meeting and conferring with CITGO and PDVH to discuss the appropriate scope of discovery. To facilitate the production of documents, the Special Master, CITGO, and PDVH have agreed upon a Confidentiality Agreement that sets forth specific procedures for the exchange of confidential information as part of the discovery process and the use of that confidential information in these proceedings.¹ The Confidentiality Agreement further provides that any other party to these proceedings may become bound by the Confidentiality Agreement and receive confidential information pursuant to its terms by signing the Acknowledgment and Agreement To Be Bound attached to the Confidentiality

¹ For the avoidance of doubt, the Confidentiality Agreement is drafted specifically to address discovery between CITGO, PDVH, and the Special Master. It is not intended to abrogate or modify the *Special Master Confidentiality Order* (D.I. 291).

Agreement.

The Special Master respectfully requests entry of the attached Confidentiality Agreement and Exhibit A (Acknowledgement and Agreement To Be Bound) to facilitate the production, exchange, and treatment of discovery materials.

Respectfully submitted,

/s/ Myron T. Steele

Myron T. Steele

On Behalf of Robert B. Pincus, Special Master for
the United States District Court for the District of
Delaware

MTS:rms/12015408/21202.00001

cc: Clerk of Court (via hand delivery)
Counsel of Record (via CM/ECF)